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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHARLES EDWARD JOHNSON, JR.,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:21-cv-1036-NJK

**STIPULATION TO VOLUNTARY REMAND
FOR FURTHER PROCEEDINGS PURSUANT
TO SENTENCE FOUR OF 42 U.S.C. § 405(g),
AND FOR ENTRY OF JUDGMENT IN FAVOR
OF PLAINTIFF**

1 IT IS HEREBY STIPULATED, by and between the parties, through their undersigned attorneys,
2 and with the approval of the Court, that this action be remanded for further administrative action pursuant
3 to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.

4 On remand, the Appeals Council will remand the case to an administrative law judge (ALJ) for a
5 new decision. The Appeals Council will instruct the ALJ to further evaluate Plaintiff's subjective
6 complaints and the medical evidence. The ALJ will take any additional action deemed necessary to
7 develop the record and issue a new decision.

8 The parties further request that the Clerk of the Court be directed to enter a final judgment in
9 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

10 Respectfully submitted,

11 Dated: December 13, 2021

GERALD M. WELT, CHTD.

12 /s/ Gerald Morris Welt
13 GERALD MORRIS WELT

14 Rohlfig & Kalagian, LLP

15 /s/ Marc V. Kalagian
16 MARC V. KALAGIAN
17 (*as authorized by email)

Attorneys for Plaintiff

18 Dated: December 13, 2021

CHRISTOPHER CHIOU
Acting United States Attorney

19 /s/ Christopher J. Bella
20 CHRISTOPHER J. BELLA
21 Special Assistant United States Attorney

22
23 THE CLERK'S OFFICE IS INSTRUCTED
24 TO CLOSE THIS CASE.

IT IS SO ORDERED:

25 
UNITED STATES MAGISTRATE JUDGE

26 DATED: December 14, 2021